Shorter, Chere

From: finex@verizon.net%inter2 [finex@verizon.net] on behalf of finex@verizon.net

Sent: Tuesday, December 07, 2004 4:55 PM

To: Shorter, Chere

Subject: Comments on United States Standards for Grades of Olive oil (Docket No: FV-04-334)



December 7, 2004

Chere L. Shorter,

Standardization Section, Processed Products Branch, Fruit and Vegetable Programs, Agricultural Marketing Service, U.S. Department of Agriculture 1400 Independence Avenue SW., Room 0709, South Building; STOP 0247, Washington, DC 20250

Dear Ms. Shorter:

As a member of the North American Olive Oil Association, we are pleased to submit comments on the petition filed By the California Olive Oil Council regarding the proposed standards for grades of olive oil marketed in the United States.

While the NAOOA, as a signatory association to the quality control program of the IOOC, has been conducting independent sampling and testing of product from the retail, foodservice and bulk segments of our industry; it is time for updated official standards and governmental enforcement thereof, in this growing category.

The proposal suggests that the Linolenic Acid, parameter, currently under survey by the IOOC should be left out, pending the outcome of the IOOC survey. We agree with this point, as long as the final standards provide a timely revision clause, to incorporate the new levels of this parameter, as soon as an official IOOC announcement is made.

Proposed standards also include an organoleptic testing by a panel. We feel that such panel should be created within the USDA, comprising of USDA employees certified by the IOOC. Sampling methods and procedures for obtaining and custody of samples should also be handled independently by the USDA.

We appreciate the opportunity to provide comments and would like to confirm our support of the proposal, with above mentioned points noted.

Sincerely,

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